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JAN 18 2006

CLERK U.S. DISTRICT COURT
ANCHORAGE, ALASKA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

JON ARNOLD WOODARD,
Plaintiff,

JOHN (CRAIG) TURNBULL
Defendant.

CASE NO: A05-0089 CIV (RRB)
EXPEDITED and UNOPPOSED
MOTION and MEMORANDUM FOR
EXTENSION FOR TIME TO FILE
AN AMENDED § 2254 PETITION

Defendant, Jon A. Woodard, through his undersigned counsel,
Hugh W. Fleischer, hereby moves for an extension of the time
within which to file an amended § 2254 Petition from January 20
2006 for a period of seventy days to on or about March 30,
2006.

This motion is based on the fact that the undersigned, on
January 11, 2006 received the e-transcript of the omnibus
hearing through the sentencing, consisting of approximately 45
transcripts. The e-transcript assists greatly in assessing the
evidence. The undersigned traveled to Seward to review the
matter with petitioner Jon Woodard on Thursday, January 12,
2006. As a result of such visit, counsel has spent hours
reviewing video tapes of newscasts and interviewing a number of
additional potential affiants. Therefore, Mr. Woodard requires
more time to prepare the amended petition herein.

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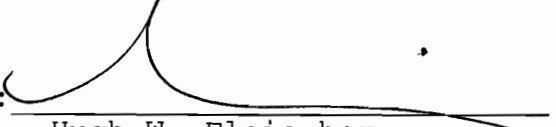
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2 William H. Hawley, Jr., Assistant Attorney General, State of
3 Alaska, has permitted the undersigned to advise this Court that
4 the State of Alaska does not oppose this motion, however Mr.
5 Hawley's schedule is such that he will not be able to address
6 this matter until April, 2006. As a result, this request is
7 for the penultimate day of March, 2006.

8 Dated this 18th day of January, 2006.

9 LAW OFFICES OF HUGH W. FLEISCHER

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By: 
12 Hugh W. Fleischer
13 Attorney for Mr. Woodard

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CERTIFICATE OF SERVICE

16 I hereby certify that on the 18th day of
17 January, 2006, I Hand Delivered a true copy of
JON WOODARD'S foregoing motion & memorandum to:

18 William H. Hawley, Jr.
Assistant Attorney General
Office of Special Prosecutions and Appeals
310 K. St., Suite 308
Anchorage, AK 99501

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